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VIA ECF

Honorable Alvin K. Hellerstein
United States District Court
Southern District of New York
500 Pearl Street, Room 1050
New York, New York 10007

Re: *Intellectual Ventures I LLC, et al. v. Citigroup, Inc., et al.*
Case No. 14-cv-4638 (AKH)

Dear Judge Hellerstein:

Along with Dunnegan & Scileppi, we represent Plaintiffs in the above action.

Regarding the Court's request in the *JPMC* litigation (Case No. 1:13-cv-3777) for the parties in this case to confer and "submit a joint letter to the Court addressing in what ways discovery can be fruitfully coordinated between the two cases," the parties report as follows. Following a meet-and-confer on this topic, the parties in *Citigroup* will endeavor to avoid duplication of deposition testimony, but do not see a viable way to achieve this given the disparity in schedules in the cases.

Defendants also wish to notify the Court that they intend to move the Court to stay this litigation pending resolution of the *JPMC* litigation.

Should the Court deny this motion, the parties jointly request that the Court adopt the same early case management procedure that the Court used in the related *JPMC* case. Specifically, the parties propose that discovery be stayed until after the Court's Markman ruling and that the Court adopt the following Markman schedule:

- October 24, 2014: IV serves preliminary infringement contentions identifying, for each limitation of each asserted claim, the feature and/or element in each accused product and service that allegedly satisfies that claim limitation.



- December 5, 2014: Citi serves preliminary invalidity contentions identifying, for each limitation of each asserted claim, the feature and/or element in each asserted prior art disclosure that allegedly satisfies that claim limitation.
- December 11, 2014: Markman Tutorial for asserted patents.
- January 5, 2015: Plaintiffs will provide its proposed constructions to Defendants.
- January 19, 2015: Defendants will provide its proposed constructions to Plaintiffs.
- February 12, 2015: Parties will file their Joint Claim Construction Chart.
- Four weeks prior to the Markman hearing: Parties will simultaneously file opening Markman briefs.
- One week prior to the Markman hearing: Parties will simultaneously file responsive Markman briefs.
- Late-March 2015: Markman hearing will be held on a date and time convenient to the Court. If it is convenient for the Court, the parties propose having the Markman hearing on two days of the same week.

Respectfully Submitted,

/s/ Sal Lim

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